

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

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| 1. GREAT LAKES INSURANCE SE, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No. CIV-22-00702-JD |
| vs. |) | Judge Jodi W. Dishman |
| |) | |
| 2. FREDY VALLE d/b/a VALLE |) | |
| TRUCKING; |) | |
| 3. SILVER STAR CONSTRUCTION |) | |
| COMPANY, INC.; |) | |
| 4. TYLON MACKEY; |) | |
| 5. ISRAEL JUAREZ; |) | |
| 6. ORD TRUCKING, INC. |) | |
| 7. ZURICH AMERICAN INS. CO., |) | |
| |) | |
| Defendants, |) | |
| |) | |
| <hr style="width: 40%; margin-left: 0;"/> | | |
| 8. ZURICH AMERICAN INS. CO., |) | |
| |) | |
| Defendant/Third Party |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| 9. PROGRESSIVE NORTHERN INS. |) | |
| CO., |) | |
| |) | |
| Third-Party Defendant. |) | |

DEFENDANT SILVER STAR CONSTRUCTION COMPANY, INC.’S
FINAL EXHIBIT LIST

Defendant Silver Star Construction Company, Inc. (“**Silver Star**”), pursuant to the Court’s Scheduling Order (Doc. No. 56), respectfully submits its Final Exhibit List.

Exhibits

| No. | Description | Will be used/May be used |
|------------|--|---------------------------------|
| 1. | Accident Report for Underlying Accident (ZAIC_00001-ZAIC_000012) | May be used |
| 2. | 7/20/2007 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000013) | May be used |
| 3. | 10/4/2007 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000014) | May be used |
| 4. | 10/22/2008 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000015) | May be used |
| 5. | 5/7/2009 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000016) | May be used |
| 6. | 5/12/2009 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000017) | May be used |
| 7. | 7/9/2010 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000018) | May be used |
| 8. | 8/17/2010 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000019) | May be used |
| 9. | 9/14/2010 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000020) | May be used |
| 10. | 9/15/2010 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000021) | May be used |
| 11. | 10/5/2010 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000022) | May be used |

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| 12. | 1/14/2011 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000023) | May be used |
| 13. | 1/14/2011 Affidavit of No Operations, Fredy N. Valle Sr. (ZAIC_000024) | May be used |
| 14. | 1/26/2011 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000025) | May be used |
| 15. | 4/12/2011 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000026) | May be used |
| 16. | 5/18/2011 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000027) | May be used |
| 17. | 5/19/2011 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000028) | May be used |
| 18. | 8/16/2011 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000029) | May be used |
| 19. | 11/7/2012 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000030) | May be used |
| 20. | 1/6/2015 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000031) | May be used |
| 21. | 3/12/2014 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000032) | May be used |
| 22. | 2/20/2015 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000033) | May be used |
| 23. | 10/29/2015 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000034) | May be used |

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| 24. | 10/19/2015 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000035) | May be used |
| 25. | 1/26/2016 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000036) | May be used |
| 26. | 2/22/2016 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000037) | May be used |
| 27. | 4/25/2016 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000038) | May be used |
| 28. | 10/5/2016 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000039) | May be used |
| 29. | 6/1/2017 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000040) | May be used |
| 30. | 4/24/2018 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 9/7/2017 (ZAIC_000041) | Will be used |
| 31. | 11/20/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 11/15/18 (ZAIC_000042) | Will be used |
| 32. | 6/1/2017 Oklahoma Corporation Commission Form K, Valle Trucking, Progressive Northern Insurance Company, coverage cancelled effective 1/11/2019 (ZAIC_000043) | Will be used |
| 33. | 12/10/2018 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 1/11/2019 (ZAIC_000044) | Will be used |
| 34. | 12/18/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 12/18/18 (ZAIC_000045) | Will be used |
| 35. | 12/5/2019 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 7/12/2019 (ZAIC_000046) | Will be used |

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| 36. | 3/15/2013 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 3/7/2013 (ZAIC_000047) | May be used |
| 37. | 5/4/2015 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 4/27/2015 (ZAIC_000048) | May be used |
| 38. | 4/30/2015 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 4/30/2015 (ZAIC_000049) | May be used |
| 39. | 5/17/2016 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 5/17/2016 (ZAIC_000050) | May be used |
| 40. | 11/27/2018 Oklahoma Corporation Commission Form E, Ord Trucking, Shelter General Insurance Company, coverage effective from 10/29/2018 (ZAIC_000051) | May be used |
| 41. | 9/2/2020 Oklahoma Corporation Commission Form K, Ord Trucking, Shelter General Insurance Company, coverage cancelled effective 11/7/2020 (ZAIC_000052) | May be used |
| 42. | 10/20/2020 Oklahoma Corporation Commission Form E, Ord Trucking, Progressive Northern Insurance Company, coverage effective from 11/7/2020 (ZAIC_000053) | Will be used |
| 43. | 7/20/2007 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company, coverage effective from 7/19/2007 (ZAIC_000054) | May be used |
| 44. | 10/4/2007 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company, coverage cancelled effective 10/25/2007 (ZAIC_000055) | May be used |
| 45. | 10/22/2008 Oklahoma Corporation Commission Form E, Fredy Valle, United Financial Casualty Company, coverage effective from 3/17/2008 (ZAIC_000056) | May be used |
| 46. | 5/7/2009 Oklahoma Corporation Commission Form K, Fredy Valle, United Financial Casualty Company, coverage cancelled effective 6/11/2009 (ZAIC_000057) | May be used |
| 47. | 5/12/2009 Oklahoma Corporation Commission Form E, Fredy Valle, United Financial Casualty Company, coverage effective from 5/11/2009 (ZAIC_000058) | May be used |

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| 48. | 7/8/10 Oklahoma Corporation Commission Form K, Fredy Valle, United Financial Casualty Company, coverage cancelled effective 8/12/2010 (ZAIC_000059) | May be used |
| 49. | 8/17/10 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 8/17/2010 (ZAIC_000060) | May be used |
| 50. | 9/13/10 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 10/15/2010 (ZAIC_000061) | May be used |
| 51. | 9/15/10 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 10/15/2010 (ZAIC_000062) | May be used |
| 52. | 10/5/10 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 11/5/2010 (ZAIC_000063) | May be used |
| 53. | 1/14/2011 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 11/24/2010 (ZAIC_000064) | May be used |
| 54. | 12/30/2010 Affidavit of No Operations, Fredy N. Valle Sr. (ZAIC_000065) | May be used |
| 55. | 1/26/2011 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 1/20/2011 (ZAIC_000066) | May be used |
| 56. | 4/12/2011 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 5/16/2011 (ZAIC_000067) | May be used |
| 57. | 5/18/2011 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 5/16/2011 (ZAIC_000068) | May be used |
| 58. | 5/19/2011 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 5/16/2011 (ZAIC_000069) | May be used |
| 59. | 8/16/2011 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 9/15/2011 (ZAIC_000070) | May be used |

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| 60. | 11/17/2012 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 11/6/2012 (ZAIC_000071) | May be used |
| 61. | 1/16/2015 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 2/16/2015 (ZAIC_000072) | May be used |
| 62. | 3/12/2014 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/18/2014 (ZAIC_000073) | May be used |
| 63. | 2/20/2015 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/16/2015 (ZAIC_000074) | May be used |
| 64. | 10/29/2015 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 10/26/2015 (ZAIC_000075) | May be used |
| 65. | 10/19/2015 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 11/16/2015 (ZAIC_000076) | May be used |
| 66. | 1/26/2016 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/26/2016 (ZAIC_000077) | May be used |
| 67. | 2/22/2016 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 3/25/2016 (ZAIC_000078) | May be used |
| 68. | 4/25/2016 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 3/25/2016 (ZAIC_000079) | May be used |
| 69. | 10/5/16 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 8/25/2016 (ZAIC_000080) | May be used |
| 70. | 6/1/17 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 7/5/2017 (ZAIC_000081) | May be used |
| 71. | 4/24/2018 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 9/7/2017 (ZAIC_000082) | May be used |

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| 72. | 11/20/2018 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 11/15/2018 (ZAIC_000083) | Will be used |
| 73. | 12/7/2018 Oklahoma Corporation Commission Form K, Fredy Valle, Progressive Northern Insurance Company, coverage cancelled effective 1/11/2019 (ZAIC_000084) | Will be used |
| 74. | 12/10/2018 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 1/11/2019 (ZAIC_000085) | Will be used |
| 75. | 12/18/2018 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 12/18/2018 (ZAIC_000086) | Will be used |
| 76. | 12/5/2019 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 7/12/2019 (ZAIC_000087) | Will be used |
| 77. | Certified copy of ZAIC policy No. BAP 9809603-04 issued to Silver Star Construction, effective dates 04/01/19-04/01/2020 (ZAIC_000088-ZAIC_000156) | Will be used |
| 78. | 07/8/2020 Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000157-ZAIC_000163) | May be used |
| 79. | 9/16/2020 Answer of ORD Trucking filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000164-ZAIC_000170) | May be used |
| 80. | 1/22/2021 Answer of Defendant Israel Juarez filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000171-ZAIC_000176) | May be used |
| 81. | 4/8/2021 Plaintiff's First Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000177-ZAIC_000183) | May be used |
| 82. | 7/29/2021 Transcript of Deposition of Israel Juarez (ZAIC_000184-ZAIC_000272) | May be used |
| 83. | 08/10/2021 Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000273-ZAIC_000277) | May be used |
| 84. | 9/7/2021 Combined Answer of Israel Juarez to Plaintiff's Petition, Plaintiff's First Amended Petition, and Plaintiff's | May be used |

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| | Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000278-ZAIC_000282) | |
| 85. | 9/7/2021 Defendant ORD Trucking's Answer to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000283-ZAIC_000291) | May be used |
| 86. | 9/27/2021 Defendant Silver Star Construction Company's Answer to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000292-ZAIC_000304) | May be used |
| 87. | 5/2/2022 Answer of Fredy N. Valle, Sr., d/b/a Valle Trucking to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000305-ZAIC_000311) | May be used |
| 88. | Defendant Silver Star Construction Company's Answers to Plaintiff's First Set of Interrogatories (ZAIC_000312-ZAIC_000334) | May be used |
| 89. | Defendant Silver Star Construction Company's Responses to Plaintiff's First Request for Admission (ZAIC_000335-ZAIC_000341) | May be used |
| 90. | Defendant Silver Star Construction Company's Answers to Plaintiff's First Requests for Production (ZAIC_000342-ZAIC_000372) | May be used |
| 91. | Defendant Fredy N. Valle, Sr., d/b/a Valle Trucking Responses to Plaintiff's First Set of Discovery Requests (ZAIC_000373-ZAIC_000391) | May be used |
| 92. | 7/15/2022 Defendant Silver Star Construction Company's Amended Answer to Plaintiff's Second Amended Petition and Cross-Claims against Defendant Fredy N. Valle, Sr., d/b/a Valle Trucking (ZAIC_000392-ZAIC_000422) | May be used |
| 93. | 8/8/2022 Answer of Fredy N. Valle, Sr., d/b/a Valle Trucking to Cross-Claim of Silver Star Construction (ZAIC_000423-ZAIC_000427) | May be used |
| 94. | ORD Trucking's Responses to Plaintiff's First Set of Discovery Requests. | May be used |
| 95. | Israel Juarez's Responses to Plaintiff's First Set of Discovery Requests. | May be used |

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| 96. | Tylon Mackey's Responses to ORD Trucking's First Set of Discovery Requests. | May be used |
| 97. | 2/7/2019 Hauling Service Agreement between Valle Trucking and Silver Star Construction Company (ZAIC_000428-ZAIC_000435) (duplicate of No. 106) | Will not use (duplicate) |
| 98. | 2/8/2019 Certificate of Liability Insurance, Berkshire Hathaway Homestate Ins. Co. to Fredy N. Valle, Sr. d/b/a Valle Trucking listing Silver Star Construction and its Subsidiaries as an additional insured (ZAIC_000436-ZAIC_000437) | Will be used |
| 99. | Uncertified copy of Great Lakes Insurance SE Policy No. GLG022472 issued to Valle Trucking, Inc. with effective dates of 2/11/19 to 2/11/20 (ZAIC_000438-ZAIC_000472) | May be used |
| 100. | Certified copy of Great Lakes Insurance SE Policy No. GLG022472 issued to Valle Trucking, Inc. with effective dates of 2/11/2019 to 2/11/2020 | Will be used |
| 101. | 2/12/2019 Certificate of Liability Insurance, Great Lakes Insurance (SE) to Valle Trucking, LLC listing Silver Star Construction Company and its Subsidiaries as Certificate Holder (ZAIC_000473) | Will be used |
| 102. | 2/20/2019 Certificate of Liability Insurance, Great Lakes Insurance (SE) to Valle Trucking, LLC listing Silver Star Construction Company and its Subsidiaries as Certificate Holder (ZAIC_000474) | Will be used |
| 103. | 9/5/2019 Certificate of Liability Insurance, Progressive Northern Insurance Company to Fredy Valle, Valle Trucking listing Silver Star Construction and its Subsidiaries as Certificate Holder (ZAIC_000475) | Will be used |
| 104. | 9/27/2021 Letter from ZAIC to Fredy Valle demanding Valle Trucking defend and indemnify Silver Star Construction Company (ZAIC_000476-ZAIC_000478) | Will be used |
| 105. | 11/15/2021 Email from J. Chris Horton to Valletrucking51@yahoo.com re: attaching filings from underlying lawsuit and Demand from ZAIC to Valle Trucking (ZAIC_000479-ZAIC_480) | May be used |
| 106. | 4/8/2021 Plaintiff's First Amended Petition filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000481-ZAIC_000487) (duplicate of No. 81) | Will not use (duplicate) |

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| 107. | 8/10/2021 Plaintiff's Second Amended Petition filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000488-ZAIC_000494) (duplicate of No. 83) | Will not use (duplicate) |
| 108. | 5/20/2021 Certificate of Service by Mail filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000495-ZAIC_000498) | May be used |
| 109. | 11/15/2021 Letter from ZAIC to Fredy Valle re: demand that Valle Trucking defend and indemnify Silver Star Construction Company (ZAIC_0000499-ZAIC_000501) | Will be used |
| 110. | 2/7/2019 Hauling Service Agreement between Valle Trucking and Silver Star Construction Company (ZAIC_000502-ZAIC_000509) | Will be used |
| 111. | 5/17/2022 Letter from ZAIC to Great Lakes Insurance SE demanding Great Lakes to defend and indemnify Silver Star Construction Company (ZAIC_000510-ZAIC_000512) | Will be used |
| 112. | 5/17/2022 Letter from ZAIC to Progressive Northern Insurance Company demanding Progressive to defend and indemnify Silver Star Construction Company (ZAIC_000513-ZAIC_000515) | Will be used |
| 113. | 5/17/2022 Letter from ZAIC to Berkshire Hathaway Homestate Ins. Co. demanding Berkshire Hathaway to defend and indemnify Silver Star Construction Company (ZAIC_000516-ZAIC_000518) | Will be used |
| 114. | 5/25/2022 Letter from Chris Horton to Jeffrey Curran, counsel for Fredy Valle d/b/a Valle Trucking, re: demand that Valle Trucking defend and indemnify Silver Star Construction Company (ZAIC_000519-ZAIC_000522) | Will be used |
| 115. | 6/20/2022 Letter from Berkshire Hathaway to ZAIC re: declining to accept tender (ZAIC_000523)-ZAIC_000524) | May be used |
| 116. | 8/9/2022 Letter from International Programs Group to Silver Star Construction Company, Chris Horton, and ZAIC re: Notice of Reservation of Rights (ZAIC_000525-ZAIC_000535) | Will be used |
| 117. | Correspondence from Progressive to Shelter Insurance dated 2/7/2023 | May be used |
| 118. | Correspondence from Silver Star's counsel to Progressive dated 9/19/2022 | May be used |

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| 119. | Correspondence from Progressive to Valle Trucking dated 2/7/2023. | May be used |
| 120. | Correspondence from Progressive to Valle Trucking dated 2/8/2023. | May be used |
| 121. | 4/4/2022 Great Lakes' Notice of Reservation of Rights to Valle Trucking. | May be used |
| 122. | 5/25/2022 Letter from J. Chris Horton to Jeffrey A. Curran re: demand for defense and indemnity of Silver Star in the litigation. | May be used |
| 123. | 11/15/2021 Email from Chris Horton to Valle Trucking's Mr. Monge re: asking him to provide the lawsuit and ZAIC's letter to his insurance company. | May be used |
| 124. | 2/8/2019 Fax from Wanadaly Cruz, licensed insurance producer, to Great Lakes with Certificate of Insurance listing Berkshire as insurer. | May be used |
| 125. | 9/4/2019 Official Oklahoma Traffic Collision Report (Case No. 2019-26398) | May be used |
| 126. | 8/10/2021 Summons to Silver Star with Plaintiff's Second Amended Petition. | May be used |
| 127. | 8/8/2022 Notice of Reservation of Rights to Silver Star and Chris Horton from International Programs Group. | May be used |
| 128. | 2/10/2022 Email from Kenneth A. Shaw at Richey Ins to j.f.thill@jplush.com (John) re: Got this memo today. Please review. <ul style="list-style-type: none"> Includes forwarded 2/10/2022 email from Casey Ryan at ZAIC to Richey Ins re; reporting claim for claimant Tylon Mackey for date of loss 9/4/2019, with attachments. | May be used |
| 129. | 2/17/2022 International Programs Group Letter to Valle Trucking re: reviewing the lawsuit and will advise regarding his request for defense and indemnity. Acknowledges Valle not yet been served, recommends he contact his attorney to protect his interests. | May be used |
| 130. | 10/4/2021 Letter from ZAIC to Fredy Valle re: demanding defense and indemnity by Valle for Silver Star. | May be used |
| 131. | 2/14/2022 Email from John Thill to Terri Singleton re: the application we have shows the contact person as Freddy Napoleon Valle Arana and the phone number 405-501-8005 <ul style="list-style-type: none"> Includes 2/14/23 email from Terri Singleton to Mr. Shaw re: claim assigned to me for handling. | May be used |

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| | <ul style="list-style-type: none"> Includes 2/11/22 email from j.f.thill@jplush.com to IPG Claims New Loss Notification. | |
| 132. | <p>2/11/2022 Email from Jessica Christopher to Samantha Porbeck, IPG Claims New Loss Notification, and Terri Singleton re: Set up as 77889</p> <ul style="list-style-type: none"> Includes 2/11/22 email from Samantha Porbeck to IPG Claims New Loss Notification re: Please assign to Terri. | May be used |
| 133. | 2/15/2022 Email from Terri Singleton to newclaims@eandsclaims.com re: ZAIC is requesting defense for the lawsuit due to the Hauling Service Agreement. | May be used |
| 134. | 08-29-2019 Valle Trucking Invoice/Field Ticket No. 5524 to Silver Star Construction Company, Inc. | May be used |
| 135. | 08-29-2019 Valle Trucking Invoice/Field Ticket No. 5525 to Silver Star Construction Company, Inc. | May be used |
| 136. | 08-29-2019 Valle Trucking Invoice/Field Ticket No. 5527 to Silver Star Construction Company, Inc. | May be used |
| 137. | 08-29-2019 Valle Trucking Invoice/Field Ticket No. 5561 to Silver Star Construction Company, Inc. | May be used |
| 138. | 08-29-2019 Valle Trucking Invoice/Field Ticket No. 5563 to Silver Star Construction Company, Inc. | May be used |
| 139. | 09-03-2019 Valle Trucking Invoice/Field Ticket No. 5008 to Silver Star Construction Company, Inc. | May be used |
| 140. | 09-03-2019 Valle Trucking Invoice/Field Ticket No. 5528 to Silver Star Construction Company, Inc. | May be used |
| 141. | 09-03-2019 Valle Trucking Invoice/Field Ticket No. 5536 to Silver Star Construction Company, Inc. | May be used |
| 142. | 09-04-2019 Valle Trucking Invoice/Field Ticket No. 5009 to Silver Star Construction Company, Inc. | May be used |
| 143. | 09-04-2019 Valle Trucking Invoice/Field Ticket No. 5562 to Silver Star Construction Company, Inc. | May be used |
| 144. | 09-04-2019 Valle Trucking Invoice/Field Ticket No. 5574 to Silver Star Construction Company, Inc. | May be used |
| 145. | 09-04-19 Valle Trucking Invoice/Field Ticket No. 5613 to Silver Star Construction Company, Inc. | May be used |
| 146. | Medical Records of Tylon Mackey produced in Payne County, Oklahoma District Court Case No. CJ-2020-233. | May be used |
| 147. | Medical Bills of Tylon Mackey produced in Payne County, Oklahoma District Court Case No. CJ-2020-233. | May be used |
| 148. | 7/29/2021 Video Deposition of Israel Juarez. | May be used |

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| 149. | 7/20/2023 Deposition of Jesus Ordones. | May be used |
| 150. | 2/15/2022-2/16/2022 Claim notes of Great Lakes. | May be used |
| 151. | All pleadings, motions, and orders filed in Payne County, Oklahoma District Court Case No. CJ-2020-233 | May be used |
| 152. | All discovery exchanged in Payne County, Oklahoma District Court Case No. CJ-2020-233 | May be used |
| 153. | All discovery exchanged in the instant action | May be used |
| 154. | Transcripts of all depositions taken in Payne County, Oklahoma District Court Case No. CJ-2020-233 | May be used |
| 155. | Transcripts of all depositions taken in the instant action | May be used |
| 156. | Expert reports of all experts identified by any party to this action | May be used |
| 157. | Expert reports of all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233 | May be used |
| 158. | Expert CVs of all experts identified by any party to this action | May be used |
| 159. | Expert CVs of all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233 | May be used |
| 160. | Expert invoices for time spent by all experts identified by any party to this action | May be used |
| 161. | Expert invoices for all time spent by all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233 | May be used |
| 162. | Expert prior testimony history for all experts identified by any party to this action | May be used |
| 163. | Expert prior testimony history for all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233 | May be used |
| 164. | Expert publications for all experts identified by any party to this action | May be used |
| 165. | Expert publications for all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233 | May be used |

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| 166. | All documents exchanged by Progressive with its Initial Disclosures in this action unless otherwise objected to by ZAIC | May be used |
| 167. | All documents exchanged by Great Lakes with its Initial Disclosures in this action unless otherwise objected to by ZAIC | May be used |
| 168. | All documents exchanged by ZAIC with its Initial Disclosures in this action unless otherwise objected to by ZAIC | May be used |
| 169. | All documents produced in response to Subpoenas in this action | May be used |
| 170. | All documents produced in response to Subpoenas in Payne County, Oklahoma District Court Case No. CJ-2020-233 | May be used |
| 171. | All documents exchanged in discovery in Payne County, Oklahoma District Court Case No. CJ-2020-233 | May be used |
| 172. | All documents exchanged in discovery in the instant action unless otherwise objected to by Silver Star. | May be used |
| 173. | All deposition exhibits of depositions taken in this action unless otherwise objected to by Silver Star. | May be used |
| 174. | All deposition exhibits of depositions taken in Payne County, Oklahoma District Court Case No. CJ-2020-233 unless otherwise objected to by Silver Star. | May be used |
| 175. | All verified discovery responses from this action unless otherwise objected to by ZAIC | May be used |
| 176. | All verified discovery responses in Payne County, Oklahoma District Court Case No. CJ-2020-233 unless otherwise objected to by Silver Star. | May be used |
| 177. | Plaintiff's Answers to ZAIC's Interrogatories | May be used |
| 178. | Progressive's Answers to ZAIC's Interrogatories | May be used |
| 179. | Plaintiff's Responses to ZAIC's Requests for Production | May be used |
| 180. | Progressive's Responses to ZAIC's Requests for Production | May be used |
| 181. | Progressive's Responses to ZAIC's Requests for Admission | May be used |

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| 182. | Exhibits identified in Great Lakes' responses to ZAIC's discovery requests. | May be used |
| 183. | Exhibits identified in Progressive's responses to ZAIC's discovery requests. | May be used |
| 184. | Exhibits identified by ongoing discovery in this action. | May be used |
| 185. | Exhibits identified by ongoing discovery in the underlying action. | May be used |
| 186. | All exhibits listed by ZAIC in this case not otherwise objected to by Silver Star. | May be used |
| 187. | All exhibits listed by Plaintiff in this case not otherwise objected to by Silver Star. | May be used |
| 188. | All exhibits listed by Progressive in this case not otherwise objected to by Silver Star. | May be used |
| 189. | Affidavits or other documents needed for the identification and authentication of records. | May be used |
| 190. | All materials considered or relied upon by experts in forming their opinions. | May be used |
| 191. | All exhibits necessary for rebuttal or impeachment. | May be used |
| 192. | Any exhibits identified as discovery progresses in this matter. | May be used |

Respectfully Submitted,

/s/ J. Chris Horton

J. Chris Horton, OBA#19334

J. CHRIS HORTON, PC

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CERTIFICATE OF SERVICE

I, Amy E. Hampton, hereby certify that on this 19th day of September, 2023, a true and correct copy of the foregoing document was served upon the following via the Court's electronic notification system:

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